

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC.,  
formerly known as  
HELLER HEALTHCARE FINANCE, INC. )

Plaintiff, )

v. )

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA. )

Defendant. )

Civil Action No. 05-11128-NG

**ASSENTED TO MOTION FOR ENLARGEMENT OF TIME IN WHICH TO  
MOVE, RESPOND, OR OTHERWISE PLEAD TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendant National Union Fire Insurance Company of Pittsburgh, P.A. ("National Union"), moves this Court for an order enlarging the time within which it may move, respond or otherwise plead to the Complaint to and including July 29, 2005. In support of this assented to motion, National Union states:

1. On May 31, 2005, the plaintiff, GE HFS Holdings, Inc., formerly known as Heller Healthcare Finance, Inc. ("Plaintiff"), filed its Complaint.

2. National Union seeks to enlarge the time within which it may move, respond or otherwise plead to the Complaint in order to complete its investigation of the allegations in the Complaint and fully address the claims set forth therein.

3. On or about June 27, 2005, counsel for National Union spoke with Jeffrey E. Francis, counsel for Plaintiff, and Attorney Francis consented to this motion for

enlargement of time to move, respond, or otherwise plead to the Complaint to and including July 29, 2005.


4. Neither party will be prejudiced by the relief sought by this motion.

WHEREFORE, National Union moves this Court for leave to enlarge time within which it may move, respond or otherwise plead to the Complaint to and including June 30, 2005.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: June 27, 2005

  
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John D. Hughes (BBO# 243660)  
Mary Patricia Cormier (BBO# 635756)  
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CERTIFICATE OF SERVICE

I, Mary Patricia Cormier, hereby certify that on this 27th day of June, 2005, I served a copy of the foregoing document via first class mail, postage prepaid to Gayle P. Ehrlich and Jeffrey E. Francis, Sullivan & Worcester LLP, One Post Office Square, Boston, MA 02109.

  
\_\_\_\_\_  
Mary Patricia Cormier

RULE 7.1 CERTIFICATE

I, Mary Patricia Cormier, hereby certify that on the 27th day of June, 2005, I conferred with Jeffrey Francis, counsel for Plaintiff, who assented to this Motion.

  
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Mary Patricia Cormier